

UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

NICOLE TAYLOR REED,

)
)
Plaintiff,)

v.

)
CIVIL ACTION NO.

BIG LOTS STORES, INC.,

)
)
2:06-CV-00380-MHT-CSC
)
Defendant.)
)
)

DEFENDANT BIG LOTS STORES, INC.'S MOTION TO COMPEL

For the reasons set forth in the accompanying memorandum, Defendant Big Lots Stores, Inc. ("Big Lots") hereby moves this Court to issue an order compelling Plaintiff Nicole Taylor Reed ("Plaintiff") to respond to Big Lots' First Set of Interrogatories and First Requests for Production. Big Lots also asks that Plaintiff be required to pay all expenses incurred by Big Lots in preparing and filing this Motion and supporting memorandum, including attorneys' fees.

Respectfully submitted this ____ day of October, 2006.

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/ s / Joseph T. Carpenter

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BIG LOTS STORES, INC.

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CERTIFICATE OF SERVICE

I hereby certify I have served Plaintiff with the foregoing **DEFENDANT BIG LOTS STORES, INC.'S MOTION TO COMPEL** by causing a copy to be sent via certified mail, return receipt requested, to:

Nicole Taylor Reed
1148 Barley Drive
Montgomery, AL 36111

This ____ day of October, 2006.

/s/ Joseph T. Carpenter
Joseph T. Carpenter
Alabama Bar No. 5114C59J

Big Lots/Reed

Formal Papers

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